



## Privacy Statement COVID-19 vaccination programme

### General

The Netherlands has launched a vaccination programme to vaccinate everyone against SARS-CoV-2, the virus that causes COVID-19. This programme is being conducted by RIVM under the responsibility of the Ministry of Health, Welfare and Sport (VWS). Important elements of the programme include the organisation of the implementation, the registration, monitoring activities, and the evaluation of the vaccine. This will also involve the processing of personal data.

In this *privacy statement*, we explain how personal data is processed. This is not only because we consider it important to inform you, but also because you are legally entitled to clear and transparent information about how we are using your data and why.

When you are invited to receive the vaccination, you will also be asked for permission to allow RIVM to register your personal data. You are not obliged to grant this permission. You can still be vaccinated even if you do not grant this permission.

For more information, see the RIVM page about your rights:  
<https://www.rivm.nl/en/covid-19-vaccination/privacy/rights>

In this privacy statement, we answer the following questions:

1. What information does RIVM register and where does it come from?
2. Why is RIVM using a central registration system to store personal data?
3. What does the law say about the use of my data?
4. How long will my data be retained?
5. With whom will my data be shared?
6. Where will my data be processed?
7. Will there be profiling on the basis of my data?
8. How can I review my own data?
9. How is my data protected?
10. How can I submit a complaint?

## 1. What information does RIVM register and where does it come from?

RIVM registers personal data, vaccination data and general data.

- a.** Your **personal data** is obtained from one of the following sources:
- the Personal Records Database (BRP);
  - the Register of Non-Residents (RNI) with a residence address in the Netherlands registered in the BRP;
  - the personal records database of the Ministry of Foreign Affairs (PROBAS);
  - the records of the Central Agency for the Reception of Asylum Seekers (COA).

The data obtained will be your name, address, city/town of residence, date of birth, gender, citizen service number (BSN), and any titles you may have.

- b.** Your **vaccination data** is obtained from the healthcare provider that gave you a vaccination:
- name, date of birth and citizen service number (BSN);
  - the reason why you are eligible for a vaccination (i.e. medical indication, occupation, age);
  - organisation and healthcare provider that gave you the vaccination;
  - date and location of the vaccination;
  - manufacturer of the vaccine and batch ID of the vaccine given to you.
- c.** The **general information** also comes from the healthcare providers. This is information about the number of people that did and did not grant permission for the registration of their personal data, the number of people who did and did not get the vaccine, and the types of vaccine administered.

## 2. Why is RIVM using a central registration system to store personal data?

RIVM needs the personal data to continuously monitor the effect of the vaccination programme. This enables RIVM to:

- take immediate steps in the event of severe side-effects or other problems;
- keep track of how many people in the Netherlands have been vaccinated;
- assess the efficacy and safety of the vaccines;
- send invitations and reminders for vaccination appointments.

Whenever there is an outbreak of an infectious disease, it is very important to know how many people are already protected by vaccination. With that knowledge, we can determine the risk that unvaccinated people will become ill and whether the government needs to implement special measures.

## 3. What does the law say about the use of my data?

The General Data Protection Regulation (GDPR) (<https://business.gov.nl/regulation/protection-personal-data/>) states when the use of personal data and special categories of personal data (in this case, your vaccination data) is permitted. This may be allowed, for example, if the requester has a public task and if the data is used to protect public health. RIVM has a public task and the data is being used for a national vaccination programme to protect the population against the coronavirus.

The use of citizen service numbers: The General Provisions on the Civilian Service Number Act (*Wet algemene bepalingen personenservicenummer* ([https://www.eerstekamer.nl/wetsvoorstel/30312\\_wet\\_algemene\\_bepalingen](https://www.eerstekamer.nl/wetsvoorstel/30312_wet_algemene_bepalingen))) states when your citizen service number may be used. This is permitted, for example, if the requester has a public task.

The law stipulates that RIVM is permitted to obtain data from the BRP and RNI, and this is also specifically stipulated in an authorisation decision of the Ministry of the Interior and Kingdom Relations. RIVM does not require your approval for obtaining this data from the BRP (for more information, see: <https://www.government.nl/topics/personal-data/personal-records-database-brp>).

#### **4. How long will my data be retained?**

Your personal data and your vaccination data will be retained in the registration system for 20 years. This term begins as from the last change in your file. This is established in the Medical Treatment Contracts Act (*Wet op de geneeskundige behandelingsovereenkomsten*) and the Public Health Act (*Wet publieke gezondheid*).

The healthcare provider will supply your vaccination data to RIVM in the form of an electronic file. This file will be destroyed within a few weeks after being imported into the CIMS. These few weeks are needed for quality control purposes, that is, to verify (if necessary) whether the data was imported into the CIMS correctly. RIVM takes adequate steps to ensure that these source files are used in a secure manner.

#### **5. With whom will my data be shared?**

Your data may be shared with the following parties:

The Pharmacovigilance Centre Lareb is monitoring the programme closely for side-effects. If anyone reports any side-effect, Lareb may, with the permission of the reporting party, request the vaccination data from RIVM. In that case, the following data will be requested:

- Vaccination data of first and second injection;
- Citizen service number (BSN);
- Name and address;
- Date of birth;
- Gender.

Your data from the CIMS may have to be released pursuant to legislation and regulations or as the result of a lawsuit.

The Health and Youth Care Inspectorate (IGJ) may request data in the performance of its statutory duties.

Data from the vaccination programme may at some point in the future be used for scientific research. In that event, the researchers will only be provided with personal data that has undergone *pseudonymisation*, i.e., that has been stripped of citizen service number, name, address and date of birth. The researchers do not need to request your permission to use this data, because it can no longer be used to identify you. In the event that they do require personal information for the research, permission for this will always have to be requested.

## **6. Where will my data be processed?**

Your data will be processed exclusively on servers in the Netherlands, and specifically in the national government's data centre in Amsterdam. Your data will not be processed in another country.

## **7. Will there be profiling on the basis of my data?**

There is no profiling involved in the COVID-19 vaccination programme. Profiling is the automated analysis of large volumes of data for purposes such as determining interests and products purchased to then suggest advertisements.

## **8. How can I review my own data?**

- You can view your own data on [my.rivm.nl/vaccinations](https://my.rivm.nl/vaccinations), from mid-April 2021. You will need your DigiD for this purpose.
- You will also be able to have your data corrected or deleted. To do this, you must submit a request to RIVM. You can do this in one of the following ways:
  - using the form on the website: <https://www.rivm.nl/en/covid-19-vaccination/privacy/rights>.
  - by sending a registered letter to: RIVM, attn. DVP AVG-team, Antwoordnummer 10097 | 2700VB Zoetermeer (NL).

After we have received your request, RIVM must establish that it is actually you making the request. To do this, you will be requested to submit a copy of your identity card, passport or driving license. RIVM will only use your identification information to verify your identity, and will delete this information as soon as your identity is established. The KopieID app allows you to make a secure copy of your ID using your smartphone. Ensure that your photo is rendered unrecognisable. This app was created by the Netherlands Ministry of the Interior and Kingdom Relations. Read how to download the KopieID app here. (<https://english.defensie.nl/topics/travel-documents/identity-fraud-and-safe-airports>)

## **9. How is my data protected?**

The Ministry of Health, Welfare and Sport, of which RIVM is a part, has appointed a Data Protection Officer (DPA). The DPA is independent and functions as an internal monitor. The scope of this monitoring includes RIVM. The DPA checks whether the Ministry is applying and complying with the rules of the law.

You can contact our Data Protection Officer by sending an e-mail to [FG-VWS@minvws.nl](mailto:FG-VWS@minvws.nl).

## **10. How can I submit a complaint?**

If you object to RIVM processing your data for the COVID-19 vaccination programme, you can submit a complaint to:

- RIVM. See: <https://www.rivm.nl/en/complaints>
- the Data Protection Officer. E-mail address: [FG-VWS@minvws.nl](mailto:FG-VWS@minvws.nl).
- the Dutch Data Protection Authority. See: <https://autoriteitpersoonsgegevens.nl/nl/zelf-doen/privacyrechten/klacht-indienen-bij-de-ap>.